

(“Plaintiffs”) upon the accompanying memorandum of law, and the Declaration of Laurence Rosen, both dated August 8, 2016, the exhibits annexed thereto, all other pleadings, proceedings, and material on file in this action, such matters and facts of which the Court may take judicial notice, and upon such further written and oral argument as may be presented to the Court, will and hereby do move this Court, the Hon. George B. Daniels, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, NY, 10007, Courtroom 11A, on a date and time to be set by the Court, for an order striking certain documents submitted by Defendant China XD Plastics Co. Ltd. in opposition to Plaintiffs’ Letter Application for Leave to Amend,

and all arguments based thereon, and awarding such other and further relief as the Court deems appropriate.

Dated: August 8, 2016

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen  
Laurence Rosen